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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	)	Rulemaking 06-04-009 (Filed April 13, 2006)

REPLY COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON THE PROPOSED DECISION FOR THE CPUC'S INTERIM EMISSIONS PERFORMANCE STANDARD

January 8, 2007

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In accordance with Rule 14.3 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the California Municipal Utilities Association ("CMUA") hereby files these Reply Comments to parties' opening comments on the *Interim Opinion on Phase 1 Issues: Greenhouse Gas Emissions Performance Standard* ("Proposed Decision") filed December 13, 2006, in Rulemaking R.06-04-009 ("Rulemaking"). CMUA replies to the joint opening comments of the National Resources Defense Council, The Utility Reform Network, and the Union of Concerned Scientists ("NRDC Comments").

I. REPLY COMMENTS OF CMUA.

The NRDC Comments state that "nearly all of the design, implementation, and enforcement details are consistent with the language and intent of SB 1368, and we commend President Peevey and ALJ Gottstein for drafting a DD that is legally sound."[1]

CMUA also lauds President Peevey, ALJ Gottstein, *and* Commission staff for their dedication and hard work in a compressed time frame to consider and propose many program details for load serving entities that are workable, reasonable, and in harmony with SB 1368. CMUA, however, disagrees with virtually all of the points presented by the NRDC Comments

[1] NRDC Comments at 3.

but most particularly the position that all covered procurements must be with specified sources. This position is a misrepresentation of law and supports a basic and fundamental error in the Proposed Decision.

A. The NRDC Comments support a fundamentally flawed paradigm that SB 1368 permits only unit-specific long-term financial commitments.

The basic error in the Proposed Decision is its interpretation of SB 1368 that would require that the EPS must be applied to a specific unit, therefore mandating that all long-term financial commitments must be unit-specific. This elemental misinterpretation creates a flawed paradigm from which other errors in the Proposed Decision flow.

Patently, the EPS is a standard of measure for the CO_2 emitted by powerplants. Yet, because the stated purpose of SB 1368 is to reduce the potential for financial and reliability risks to electricity consumers, the point of reference for the EPS is not always a specific powerplant. The point of reference is the risk incurred as a result of certain electricity procured by a load-serving entity to serve its retail customers.

The important nuance in SB 1368 is that the EPS applies to the emissions of baseload generation supplied under a long-term financial commitment *as those terms are defined in SB 1368*.[2] Baseload generation is the electricity generation from a powerplant[3] and a long-term financial commitment is the procurement of electricity generation through either a new ownership investment or a new or renewed contract.[4] Baseload generation, by definition, does not of necessity comprise an identifiable powerplant but it always comprises the procurement of electricity generation. The EPS, therefore, is measured against the emissions (pounds of CO_2) from the one or many power plants supplying the baseload generation (MWh) procured via the long-term financial commitment.[5]

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[2] Pub. Util. Code § 8341(a)(emphasis added). "This bill would prohibit any load-serving entity, as defined, and any local publicly owned electric utility, from entering into a long-term financial commitment, *as defined*, unless any baseload generation, *as defined*, complies with a greenhouse gases emission performance standard." *Legislative Counsel's Digest for SB 1368* (emphasis added).

[3] Pub. Util. Code § 8340(a)

[4] Pub. Util. Code § 8340(j).

[5] Depending upon the nature of the long-term financial commitment, this could be actual emissions, averaged emissions, or even imputed emissions.

Since SB 1368 expressly defines both of the terms "baseload generation"[6] and "powerplant,"[7] it clearly indicates that these terms are different, distinct, and necessary to distinguish the Legislature's intent.[8] The following tables provide a list of key references to the term "baseload generation" in SB 1368. These references provide a clear indication of legislative intent by showing that the defined terms of "baseload generation" and "powerplant" are not interchangeable.

""Baseload generation" means *electricity generation from a powerplant* that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent." Pub. Util. Code § 8340(a) (emphasis added).
The Legislature *did not* define baseload generation to mean a *powerplant* that is designed and intended to provide electricity at an annualized plant capacity factor of at least 60 percent.

"No load-serving entity . . . may enter into a long-term financial commitment unless any *baseload generation supplied* under the long-term financial commitment complies with the greenhouse gases emission performance standard . . ." Pub. Util. Code § 8341(a) (emphasis added).
The Legislature *did not state* that no load-serving entity may enter into a long-term financial commitment unless any *power plant supplying baseload generation* under the long-term financial commitment complies with the EPS.

[6] Pub. Util. Code § 8340(a).

[7] ""Powerplant" means a facility for the generation of electricity, and includes one or more generating units at the same location." Pub. Util. Code § 8340(m).

[8] "In determining such intent, a court must look first to the words of the statute themselves, giving to the language its usual, ordinary import and according significance, if possible, to every word, phrase and sentence in pursuance of the legislative purpose." *Dyna-Med, Inc. v. Fair Employment & Housing Com.*, 43 Cal.3d 1379, 1386-1387 (1987); "Interpretive constructions which render some words surplusage, defy common sense, or lead to mischief or absurdity, are to be avoided." *California Manufacturers Assn. v. Public Utilities Commission*, 24 Cal. 3d 836, 844 (1979).

"The commission shall not approve a long-term financial commitment by an electrical corporation unless any *baseload generation supplied* under the long-term financial commitment complies with the greenhouse gases emission performance standard established . . . ." Pub. Util. Code § 8341(b)(1) (emphasis added).
The Legislature *did not state* that the commission shall not approve a long-term financial commitment by an electrical corporation unless any *power plant supplying baseload generation* under the long-term financial commitment complies with the EPS.

"The commission shall adopt procedures, for all load-serving entities, to verify the emissions of greenhouse gases from *any baseload generation* supplied under a contract subject to the [EPS] . . . ." Pub. Util. Code § 8341(b)(3) (emphasis added).
The Legislature *did not state* that the commission shall adopt procedures, for all load-serving entities, to verify the emissions of greenhouse gases from *any power plant supplying baseload generation* under a contract subject to the EPS.

The essential point is that the clear and unambiguous definition of "baseload generation" and the use of that term in establishing the core concepts of SB 1368 indicate the Legislature's interpretive paradigm. The EPS is a standard of measure to gauge the aggregate emission rate of the electricity generation procured by a load-serving entity to serve its retail load. This paradigm accurately captures the load-serving entity's potential financial and reliability risk associated with the long-term financial commitment. Accordingly, there is nothing in SB 1368 to support the conclusion that all long-term financial commitments must be unit-specific. The NRDC Comments err is supporting this notion, and should be accorded no weight.

B. The language of SB 1368 does not prohibit R&D.

NRDC supports the Proposed Decision's error in stating that the only R&D under a long-term financial commitment is limited to activities involving sequestration. This position is contrary to other federal and state statutes that encourage research, experimentation, and the

development of technologies that will enable reduced CO_2 emissions from power plants using a diversity of fuels. As noted in CMUA's Opening Comments, it is also contrary to the clear direction of SB 1368, and the Commission must reject the NRDC comments and reconsider this position in the Proposed Decision.

II. II. CONCLUSION

CMUA asks the Commission to carefully reconsider its basic interpretation of SB 1368, particularly in regard to the Proposed Decision's conclusion that all covered procurements must be with unit-specific resources. In addition, CMUA asks the Commission to incorporate into the Proposed Decision, the concepts expressed in the reply comments of the Sacramento Municipal Utility District and the Northern California Power Agency.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

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on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 8th day of January 2007, at Sacramento, California.

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